

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE ORGANOGENESIS SECURITIES LITIGATION

No. 04-CV-10027 (JLT)

MOTION FOR ENTRY OF PROTECTIVE ORDER

In accordance with Federal Rule of Civil Procedure 26(c), Defendants Albert Erani, Philip Laughlin, Donna Abelli Lopolito, Michael Sabolinski and Alan Tuck (“Defendants”) respectfully request that the Court enter the proposed Protective Order attached hereto as Exhibit A.

As grounds for this motion, the Defendants state:

1. The entry of the proposed Protective Order is necessary because discovery in this matter will involve the disclosure of certain documents, things and information in the possession, custody or control of the parties or non-parties that constitute or contain trade secrets or other confidential research, development or commercial information within the meaning of Rule 26(c)(7) of the Federal Rules of Civil Procedure, and which would not be disclosed to the receiving parties but for this litigation.

2. Such confidential information must be protected in order to preserve the legitimate business interests of the parties or non-parties. Thus, Defendants are submitting the proposed Protective Order for the purpose of advancing the progress of this case and to prevent unnecessary dissemination or disclosure of such confidential information.

3. Defendants submitted the proposed Protective Order to plaintiffs on May 2, 2006, and requested plaintiffs’ agreement to stipulate to the entry of the proposed Protective Order. Defendants have not received a response from plaintiffs despite repeated inquiries, including

most recently by letter dated June 6, 2006. Counsel for Defendants John Arcari and Herbert Stein assent to this Motion.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), as discussed in paragraph 3 above, Defendants' counsel has contacted Plaintiffs' counsel on multiple occasions in an attempt in good faith to resolve or narrow the issue set forth in this motion, but have not received a response. Counsel for Defendants John Arcari and Herbert Stein assent to this Motion.

WHEREFORE, the Defendants respectfully request that the Court enter the proposed Protective Order attached hereto as Exhibit A.

Dated: June 15, 2006

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Kimberly Friday

Jeffrey B. Rudman (BBO #433380)

Jonathan A. Shapiro (BBO #567838)

Peter J. Kolovos (BBO #632984)

Kimberly I. Friday (BBO #660544)

60 State Street

Boston, MA 02109

(617) 526-6000

*Counsel for Defendants Albert Erani, Donna Abelli Lopolito, Philip Laughlin,
Michael Sabolinski, and Alan Tuck*

Certificate of service

I, Kimberly Friday, hereby certify that a true copy of this document and attached exhibit, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 15, 2006.

/s/ Kimberly Friday
Kimberly Friday